

Shawn Grooms 08/08/2025

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COURT OF COMMON PLEAS

ADAMS COUNTY, OHIO

Larry Heller
CLERK

SHAWN D. COOLEY, et :
al., :
: Judge Jerry McBride
:
Plaintiffs, : CASE NO. 2023-0069
:
vs. :
:
JOSEPH EDGAR :
FOREMAN a/k/a :
AFROMAN, et al., :
:
:
Defendants. :

The video deposition of SHAWN GROOMS, a plaintiff herein, taken by the defendants as upon cross-examination, pursuant to the Ohio Rules of Civil Procedure and pursuant to Agreement of counsel as to the time and place and stipulations hereinafter set forth, at the Law Offices of Dr. David Osborne, Jr., LLC, 115 West Main Street, West Union, Ohio, at 11:30 a.m., Friday, August 8, 2025, before Julie Patrick, a Notary Public within and for the State of Ohio.

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Shawn Grooms 08/08/2025

2	4
1 APPEARANCES	1 INDEX
2	2 WITNESS DIRECT CROSS RE- RE-
3 FOR THE PLAINTIFFS: ROBERT A. KLINGLER, ESQ.	3
4 Robert A. Klingler Co.,	4 SHAWN GROOMS
5 LPA	5 By Mr. Osborne: 5 35
6 525 Vine Street	6 By Mr. Klingler: 34
7 Suite 2320	6 EXHIBIT IDENTIFIED PAGE
8 Cincinnati, OH 45202	7 Plaintiffs' Exhibit 8 search warrant 13
9	8
10 FOR THE PLAINTIFFS SARA MCELROY, ESQ.	9
11 AS TO COUNTERCLAIM: Fishel Downey Albrecht &	10
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13 7775 Walton Parkway Suite	12
14 200	13
15 New Albany, OH 43054	14
16 FOR THE DEFENDANTS: DAVID OSBORNE, JR., ESQ.	15
17 Osborne Law Office	16
18 115 W. Main St.	17
19 West Union, OH 45693	18
20	19
21	20
22	21
23	22
24	23
25	24
14 ALSO PRESENT:	25
15 Laken Schafer - videographer	
16 Joseph Foreman	
17 Lisa Phillips	
18 Brian Newland	
19 Shawn Cooley	
20 Randolph Walters	
21	
22	
23	
24	
25	
3	5
1 S T I P U L A T I O N S	1 SHAWN GROOMS,
2 It is stipulated by counsel for the	2 a plaintiff herein, of lawful age, having
3 respective parties that the video deposition	3 been first duly sworn as hereinafter
4 of SHAWN GROOMS, a plaintiff herein, may be	4 certified, was examined and testified as
5 taken at this time by the defendants as upon	5 follows:
6 cross-examination and pursuant to the Ohio	6 CROSS-EXAMINATION
7 Rules of Civil Procedure and Agreement of	7 BY MR. OSBORNE:
8 counsel to take deposition, all other legal	8 Q. Could you please state your full
9 formalities being waived by agreement; that	9 name for the record?
10 the deposition may be taken in stenotype by	10 A. It's Shawn David Grooms.
11 the Notary Public-Reporter and transcribed by	11 Q. Shawn, do you mind if I call you
12 her out of the presence of the witness; that	12 Shawn during the pendency of this deposition?
13 the transcribed deposition was made available	13 A. Yes, that's fine.
14 to the witness for examination and signature	14 Q. Okay. Have you ever had your
15 and that signature may be affixed out of the	15 deposition taken before?
16 presence of the Notary Public-Court Reporter.	16 A. No.
17	17 Q. Okay. You were in here when I
18	18 was talking to Randy Walters and giving him
19	19 some of the instructions. Did you hear those
20	20 instructions?
21	21 A. Yes.
22	22 Q. Do you have any questions about
23	23 those instructions?
24	24 A. No.
25	25 Q. Would you like me to go through

<p>6</p> <p>1 them again with you?</p> <p>2 A. You don't have to.</p> <p>3 Q. Okay. So, Shawn, how are you</p> <p>4 employed?</p> <p>5 A. With the Adams County Sheriff's</p> <p>6 Office.</p> <p>7 Q. How long have you been with the</p> <p>8 sheriff's office?</p> <p>9 A. Back and forth from West Union</p> <p>10 to the sheriff's office about 19 years.</p> <p>11 Q. So when did you come out of the</p> <p>12 academy?</p> <p>13 A. In '02.</p> <p>14 Q. So you came out of the academy</p> <p>15 in 2002?</p> <p>16 A. Yes.</p> <p>17 Q. Which academy did you attend?</p> <p>18 A. The one at Southern State in</p> <p>19 Hillsboro.</p> <p>20 Q. And I have to ask this for</p> <p>21 clarification. In 2002 Southern State had</p> <p>22 two campuses, Fincastle and Hillsboro, did</p> <p>23 you go to the main campus or the Fincastle</p> <p>24 one?</p> <p>25 A. It was the main campus in</p>	<p>8</p> <p>1 seven.</p> <p>2 Q. And then you went back to the</p> <p>3 sheriff's office?</p> <p>4 A. Yes, in 2020.</p> <p>5 Q. Are you still employed with the</p> <p>6 sheriff's office?</p> <p>7 A. Yes.</p> <p>8 Q. Full time or part time?</p> <p>9 A. Full time.</p> <p>10 Q. So you would have been employed</p> <p>11 full time by the sheriff's department in</p> <p>12 2022?</p> <p>13 A. Correct.</p> <p>14 Q. What were your job duties at</p> <p>15 that time in 2022?</p> <p>16 A. I was a road patrol.</p> <p>17 Q. What's the duties of a road</p> <p>18 patrol?</p> <p>19 A. Answering complaints, taking</p> <p>20 care of domestics, making arrests.</p> <p>21 Q. And this may sound like a stupid</p> <p>22 question, but you are a duly licensed peace</p> <p>23 officer in the State of Ohio?</p> <p>24 A. Correct.</p> <p>25 Q. Up to date on your CPTs?</p>
<p>7</p> <p>1 Hillsboro, Ohio.</p> <p>2 Q. Okay. So where did you get your</p> <p>3 first job out of the academy?</p> <p>4 A. With the West Union PD.</p> <p>5 Q. How long did you stay at the</p> <p>6 West Union PD?</p> <p>7 A. Approximately seven years, eight</p> <p>8 years?</p> <p>9 Q. And so after about seven or</p> <p>10 eights years you went to the sheriff's</p> <p>11 department?</p> <p>12 A. Correct.</p> <p>13 Q. Now, you said back and forth</p> <p>14 between West Union and the sheriff's</p> <p>15 department approximately 19 years. So how</p> <p>16 long did you stay with the sheriff's</p> <p>17 department the first time?</p> <p>18 A. It was probably four and a half</p> <p>19 years.</p> <p>20 Q. And then you went back to West</p> <p>21 Union?</p> <p>22 A. Yes.</p> <p>23 Q. And how long were you with them</p> <p>24 the second time?</p> <p>25 A. Roughly seven, maybe. Six,</p>	<p>9</p> <p>1 A. Yes.</p> <p>2 Q. Have you ever had any training</p> <p>3 besides CPTs in the academy?</p> <p>4 A. Yes.</p> <p>5 Q. What can you tell me about that?</p> <p>6 A. K-9 officer for approximately</p> <p>7 eight years.</p> <p>8 Q. About when to when?</p> <p>9 A. 2014, I believe.</p> <p>10 Q. To about 2022?</p> <p>11 A. Yeah.</p> <p>12 Q. I'm adding eight to '14.</p> <p>13 A. No, it would have been -- I</p> <p>14 can't remember when.</p> <p>15 Q. But you wouldn't have been a K-9</p> <p>16 officer during 2022?</p> <p>17 A. No.</p> <p>18 Q. So some time before that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. I want to ask a question</p> <p>21 because it keeps confusing me. So what is</p> <p>22 the different levels in organization at the</p> <p>23 Adams County Sheriff's Office? Everybody</p> <p>24 keeps talking about sergeants being</p> <p>25 supervisors. What's the hierarchy there for</p>

<p style="text-align: right;">10</p> <p>1 that?</p> <p>2 A. Just a sergeant and then you</p> <p>3 have your just road patrol officers and the</p> <p>4 sheriff.</p> <p>5 Q. So in the hierarchy it would be</p> <p>6 road patrol, sergeants and then the sheriff?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. I don't mean to say this</p> <p>9 derogatory or anything, but so you're just</p> <p>10 the lowest man on that totem pole?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. That's what I was getting</p> <p>13 at. Okay. Do you ever do any work with</p> <p>14 confidential informants?</p> <p>15 A. Some.</p> <p>16 Q. What kind of work have you done</p> <p>17 with them in the past?</p> <p>18 A. I've done some drug buys.</p> <p>19 Q. For those of us like myself</p> <p>20 who's not really for sure what that is, what</p> <p>21 is a drug buy?</p> <p>22 A. It is where you have an</p> <p>23 informant go and you just have him go and buy</p> <p>24 off of the person that -- off someone that</p> <p>25 they can get drugs from.</p>	<p style="text-align: right;">12</p> <p>1 they can't do. They have to be with an</p> <p>2 officer at all times if they're working for</p> <p>3 an officer.</p> <p>4 Q. Okay. So does each officer then</p> <p>5 maintain their own CIs?</p> <p>6 A. Sometimes, yes.</p> <p>7 Q. Can you clarify what you mean by</p> <p>8 sometimes?</p> <p>9 A. There's maybe two officers using</p> <p>10 the same CI.</p> <p>11 Q. Okay.</p> <p>12 A. And it may just be that just</p> <p>13 that one officer -- excuse me -- that one</p> <p>14 officer using --</p> <p>15 Q. Is there a written policy at the</p> <p>16 sheriff's office in relation to the use of</p> <p>17 confidential informants?</p> <p>18 A. That is -- I'm not aware.</p> <p>19 Q. How were you trained in the use</p> <p>20 of confidential informants?</p> <p>21 A. I went to a -- almost a two-week</p> <p>22 class in OPOTA.</p> <p>23 Q. Do you remember when that was?</p> <p>24 A. It was back when I was at West</p> <p>25 Union.</p>
<p style="text-align: right;">11</p> <p>1 Q. So is that like we see in movies</p> <p>2 where they've got that wire on them and they</p> <p>3 tape the recorder to them and everything?</p> <p>4 A. Correct.</p> <p>5 Q. How does one become a</p> <p>6 confidential informant?</p> <p>7 A. Sometimes it's got to run</p> <p>8 through the prosecutor. It's got to be</p> <p>9 okayed by probation or the judge, if they are</p> <p>10 on probation.</p> <p>11 Q. And I take it that's so they</p> <p>12 don't get violated on probation for doing the</p> <p>13 work?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. And I take it you run it</p> <p>16 by the prosecutor to make sure that, if</p> <p>17 there's any dealing in relation to criminal</p> <p>18 charges, they've okayed it?</p> <p>19 A. Yes.</p> <p>20 Q. What if the person has no</p> <p>21 criminal charges filed against them and no</p> <p>22 probation, what would be the process in that</p> <p>23 case?</p> <p>24 A. They are given a piece of paper</p> <p>25 showing what they're allowed to do and what</p>	<p style="text-align: right;">13</p> <p>1 Q. Well, you were at West Union</p> <p>2 twice, so you've got clarify that.</p> <p>3 A. It would have been the second</p> <p>4 time I was back at West Union.</p> <p>5 Q. Okay. And I think that was</p> <p>6 prior to -- so some time prior to 2020?</p> <p>7 A. Correct.</p> <p>8 Q. Is there a written policy at the</p> <p>9 Adams County Sheriff's Office on how to</p> <p>10 complete and do a return on a search warrant?</p> <p>11 A. That, I can't answer. I have</p> <p>12 never seen it.</p> <p>13 Q. Can you repeat that, please?</p> <p>14 A. I have never seen one.</p> <p>15 Q. Did you ever receive training on</p> <p>16 search warrants?</p> <p>17 A. Through the academy.</p> <p>18 (Plaintiffs' Exhibit 8 was referenced.)</p> <p>19 Q. I would like you to take a look</p> <p>20 at what's been marked Plaintiffs' Exhibit 8.</p> <p>21 Have you ever seen that search warrant before</p> <p>22 today?</p> <p>23 A. No, I have not.</p> <p>24 Q. So I guess it would be -- there</p> <p>25 would be nothing you could tell me about that</p>

<p>14</p> <p>1 search warrant or the process it went through 2 to be obtained? 3 A. No. 4 Q. Did you have any interaction 5 with the confidential informant that was the 6 basis of that search warrant? 7 A. No. 8 Q. So were you on duty on August 9 21st of 2022? 10 A. I would have been on duty but 11 they had called me in probably two hours 12 early. 13 Q. About what time were you called 14 in? 15 A. It would have been approximately 16 4:00. 17 Q. Okay. So you were set to go on 18 at 6:00 at night? 19 A. Yes. 20 Q. Okay. So they just called and 21 said, hey, do you mind coming in early? 22 A. Correct. 23 Q. Okay. So did they tell you on 24 the phone why they were calling you in early? 25 A. Something to do with a search</p>	<p>16</p> <p>1 gate? 2 A. Yes. 3 Q. Okay. Would you have had a view 4 of the back door of the residence? 5 A. I had a view all of the way down 6 through the backside of the house. 7 Q. So you were making sure no one 8 would come out the back and abscond? 9 A. Correct. 10 Q. Do you remember what you were 11 armed with? 12 A. An AR. 13 Q. Pardon me? 14 A. AR. 15 Q. An AR-15 assault rifle? 16 A. Correct. 17 Q. Was that the standard issue out 18 of the cruiser? 19 A. Yes. 20 Q. Did you observe the breach of 21 the house? 22 A. No. 23 Q. Did you take part in the breach 24 of the house? 25 A. No.</p>
<p>15</p> <p>1 warrant and that was it. 2 Q. Do you remember who called you? 3 A. I believe it was Sergeant Estep. 4 Q. Okay. So you arrive at the 5 sheriff's office. What happens next? 6 A. I can't recall. 7 Q. Was there any strategy planning 8 when you got there or anything? 9 A. Yeah, probably a half an hour 10 after I got there. 11 Q. Tell me about that, the strategy 12 meeting. 13 A. Just going over who was going to 14 be where and where we was meeting and -- 15 Q. So when you say who was to be 16 where, you're talking about who was going to 17 guard the perimeter, who was going to breach 18 the door? 19 A. Exactly. 20 Q. What was your position in this 21 plan? 22 A. If I can recall, I was on the 23 outside of the back corner towards the 24 driveway. 25 Q. Towards the driveway with the</p>	<p>17</p> <p>1 Q. Did you ever participate in the 2 search of the house? 3 A. Yes. 4 Q. Okay. So after they breach, how 5 did you become a part of the search? 6 A. They had asked for extras to 7 come in. 8 Q. And how did they ask for that? 9 Did someone just poke their head out and say, 10 hey, we need help or they go over the radio? 11 A. I think it was over the radio. 12 Q. Okay. 13 A. I'm not a hundred percent but -- 14 Q. But you were called in because 15 they needed extra help? 16 A. Correct. 17 Q. And do you recall who called you 18 in? 19 A. No, I don't. 20 Q. Okay. When you went inside, do 21 you recall what you did as part of the 22 search? 23 A. I started towards the -- through 24 the, I believe it was the kitchen area and I 25 checked a few rooms, side rooms.</p>

<p>18</p> <p>1 Q. Did you search the basement?</p> <p>2 A. I did not.</p> <p>3 Q. Do you ever remember seeing the</p> <p>4 basement?</p> <p>5 A. I do not.</p> <p>6 Q. Did you ever see any cages?</p> <p>7 A. I didn't.</p> <p>8 Q. Did you participate in the</p> <p>9 search of the suits?</p> <p>10 A. I can't recall.</p> <p>11 Q. Do you ever recall if you went</p> <p>12 upstairs?</p> <p>13 A. I did.</p> <p>14 Q. Okay. Were you wearing a body</p> <p>15 cam during the time?</p> <p>16 A. I was.</p> <p>17 Q. Would the body cam contain all</p> <p>18 of the actions you took that day?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recall finding any</p> <p>21 evidence or cataloguing any evidence while</p> <p>22 you were there?</p> <p>23 A. No.</p> <p>24 Q. In your understanding, what were</p> <p>25 they searching for? Or what were you</p>	<p>20</p> <p>1 the execution of the search warrant?</p> <p>2 A. Yes.</p> <p>3 Q. After the property was searched</p> <p>4 what did you do next?</p> <p>5 A. After the house was searched or</p> <p>6 after everything was searched?</p> <p>7 Q. That's a good question actually.</p> <p>8 So after the house was searched, what did you</p> <p>9 help search next?</p> <p>10 A. A few buildings.</p> <p>11 Q. Was anything found in those</p> <p>12 buildings?</p> <p>13 A. Not that I can recall.</p> <p>14 Q. So I take it it goes without</p> <p>15 saying -- well, strike that. No people was</p> <p>16 found hiding in buildings?</p> <p>17 A. No.</p> <p>18 Q. No cages?</p> <p>19 A. No.</p> <p>20 Q. After the buildings were</p> <p>21 searched, what happened next?</p> <p>22 A. I think I went back on regular</p> <p>23 patrol for that night.</p> <p>24 Q. Completed out your shift?</p> <p>25 A. Uh-huh.</p>
<p>19</p> <p>1 searching for when you went into the</p> <p>2 residence?</p> <p>3 A. What they had told me what they</p> <p>4 were going to be searching for.</p> <p>5 Q. Which was?</p> <p>6 A. It was a person being held there</p> <p>7 against their will and narcotics.</p> <p>8 Q. Did you have any interaction</p> <p>9 with the security system in this residence?</p> <p>10 A. No.</p> <p>11 Q. Any interaction with the CDs?</p> <p>12 A. I may have with the CDs. I'm</p> <p>13 not a hundred percent.</p> <p>14 Q. Okay. But that would be on your</p> <p>15 body cam?</p> <p>16 A. Yes, it should be.</p> <p>17 Q. Did you have any interaction</p> <p>18 with why they chose the side door to breach?</p> <p>19 A. I do not.</p> <p>20 Q. Have you had any interaction</p> <p>21 with this case other than the search warrant</p> <p>22 execution?</p> <p>23 A. I don't understand.</p> <p>24 Q. Was your sole involvement in the</p> <p>25 matter on August 21st, 2022, just to help in</p>	<p>21</p> <p>1 Q. And that was the limit of your</p> <p>2 involvement in everything?</p> <p>3 A. (Affirmative head shake.)</p> <p>4 Q. Were you involved in that in any</p> <p>5 way I haven't asked already?</p> <p>6 A. Pardon me?</p> <p>7 Q. Were you involved in this search</p> <p>8 warrant in any other way other than just</p> <p>9 helping with the execution?</p> <p>10 A. Just the execution.</p> <p>11 Q. Okay. When was the first time</p> <p>12 you became aware of the posts in reference to</p> <p>13 this?</p> <p>14 A. Probably a few weeks after.</p> <p>15 Q. How did you become aware?</p> <p>16 A. I was told about it.</p> <p>17 Q. Who told you?</p> <p>18 A. I can't recall exactly who it</p> <p>19 was. It was being talked about at the</p> <p>20 sheriff's office that there was a post about</p> <p>21 me as being the hunchback of norman dane</p> <p>22 (sic).</p> <p>23 Q. Say that again, please.</p> <p>24 A. Being the hunchback of norman</p> <p>25 dane or --</p>

<p style="text-align: right;">22</p> <p>1 Q. Hunchback norman dane?</p> <p>2 A. However you say it.</p> <p>3 MR. KLINGLER: Notre Dame maybe?</p> <p>4 The Hunchback of Notre Dame?</p> <p>5 THE WITNESS: Yeah, however you</p> <p>6 say it.</p> <p>7 Q. So the Hunchback of Notre Dame,</p> <p>8 like Quasimodo?</p> <p>9 A. Whoever he is.</p> <p>10 Q. I use Quasimodo. In the book by</p> <p>11 Victor Hugo about the Hunchback of Notre</p> <p>12 Dame, his name was Quasimodo.</p> <p>13 A. Okay.</p> <p>14 Q. A small piece of trivia. Things</p> <p>15 you pick up. Okay. Did you ever see the</p> <p>16 post calling you the Hunchback of Notre Dame?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. When did you see that</p> <p>19 post?</p> <p>20 A. Probably a few days after I was</p> <p>21 told.</p> <p>22 Q. Now, is that the only post that</p> <p>23 refers to you?</p> <p>24 A. As far as I know. I never got</p> <p>25 on and looked for any more because it is what</p>	<p style="text-align: right;">24</p> <p>1 you of things, how else has your</p> <p>2 representation been harmed?</p> <p>3 A. Just look at you different.</p> <p>4 Q. Can you give me an example of</p> <p>5 that?</p> <p>6 A. Like you're a thief or</p> <p>7 something.</p> <p>8 Q. Can you give me a specific</p> <p>9 example where this happened?</p> <p>10 A. Pardon me?</p> <p>11 Q. Can you give me a specific</p> <p>12 example where that happened?</p> <p>13 A. Where what happened?</p> <p>14 Q. So is there an example that</p> <p>15 comes to your mind where you responded to a</p> <p>16 call and that person treated you different;</p> <p>17 can you give me a specific example of that?</p> <p>18 A. I can't give you a specific.</p> <p>19 It's just different calls you go to and just</p> <p>20 people makes you feel different and look at</p> <p>21 you different and --</p> <p>22 Q. Were you ever threatened?</p> <p>23 A. Actually, I was. I had three</p> <p>24 personal phone calls to my personal cell.</p> <p>25 Q. Tell me about those calls.</p>
<p style="text-align: right;">23</p> <p>1 it is.</p> <p>2 Q. Now, you're part of this</p> <p>3 lawsuit. You're asking for damages due to</p> <p>4 your reputation. Can you tell me how being</p> <p>5 called the Hunchback of Notre Dame has</p> <p>6 affected your reputation?</p> <p>7 A. I get made fun of a lot when I</p> <p>8 go on to a call or -- and I get -- you know,</p> <p>9 like everybody else has said, I get accused</p> <p>10 of, are you going to take my money or are you</p> <p>11 going to take this or that. And it gets kind</p> <p>12 of old. I'm not a thief.</p> <p>13 Q. Do you have an explanation as to</p> <p>14 why there was a difference in the amount of</p> <p>15 money reported on the return of the search</p> <p>16 warrant than what was returned from evidence?</p> <p>17 A. I do not.</p> <p>18 Q. Is that normal for that to</p> <p>19 happen?</p> <p>20 A. No.</p> <p>21 Q. Were you ever interviewed as</p> <p>22 part of an internal investigation into that?</p> <p>23 A. No.</p> <p>24 Q. So other than just what happens</p> <p>25 when you're on a call about people accusing</p>	<p style="text-align: right;">25</p> <p>1 A. That I should be shot or beat up</p> <p>2 for doing what I done to Mr. Foreman.</p> <p>3 Q. Okay. Did you log the numbers</p> <p>4 that called?</p> <p>5 A. I did not because they were</p> <p>6 unknown.</p> <p>7 Q. So they came up on your calling</p> <p>8 ID as unknown?</p> <p>9 A. Correct.</p> <p>10 Q. And you answered them?</p> <p>11 A. (Affirmative head shake.)</p> <p>12 Q. Okay. Did you turn that</p> <p>13 information over to the prosecutor's office?</p> <p>14 A. I mentioned to the sheriff.</p> <p>15 Q. Do you know what he did?</p> <p>16 A. I don't.</p> <p>17 Q. Was anybody arrested in</p> <p>18 reference to those three calls?</p> <p>19 A. Not to my knowledge.</p> <p>20 Q. Was anybody -- did they pull any</p> <p>21 wire searches or anything?</p> <p>22 A. As far as I know, no.</p> <p>23 Q. Is threatening a police officer</p> <p>24 a crime?</p> <p>25 A. It usually is.</p>

<p>26</p> <p>1 Q. This may sound stupid, Shawn, 2 but if threatening a police officer is a 3 crime, isn't it odd that the prosecutor 4 didn't take any steps? 5 A. I can't answer that. 6 Q. In your personal opinion, do you 7 think it's odd? 8 A. Kind of. 9 Q. You have also asked in your 10 Complaint for emotional damages. Could you 11 please explain what emotional damages are. 12 Strike that. Emotional distress, sorry. 13 A. Just having to worry about 14 everything, what people thinks of you and how 15 they look at you, and it kind of played a 16 part in my family life. 17 Q. Explain that to me. 18 A. I had recently got divorced. 19 Q. Did she divorce you solely 20 because of this? 21 A. Not solely, but -- 22 Q. What did she say exactly that 23 this played into the divorce? 24 A. She didn't want to -- she was 25 tired of hearing about it. People asking</p>	<p>28</p> <p>1 A. Well, that and being called the 2 Hunchback. 3 Q. So when you say being called the 4 Hunchback, is people yelling that at you or 5 are you just referring to the post? 6 A. Just referring to the post and 7 people saying -- you know, calling me that. 8 Q. Can you give me an example of 9 people calling you that? 10 A. Yeah, you walk into a store and 11 someone sees you, look, there's Hunchback 12 from Aframan's. 13 Q. Okay. Can you give me a 14 specific instance of a store date and time? 15 A. I can't give you a date and 16 time, but I can give you a Walmart, parts 17 store. I go into the parts store every now 18 and then and people wants to bring it up. 19 Q. Have you ever been threatened on 20 the force before? 21 A. By? 22 Q. Has a person ever threatened you 23 while you have been a police officer? 24 A. Yeah, I'm sure they have. 25 Q. Have you ever been called</p>
<p>27</p> <p>1 her, is your husband a thief and how could he 2 do something like this or -- 3 Q. Shawn, I apologize for not 4 knowing the answer to this. What was your 5 ex-wife's name? 6 A. It was Rhonda. 7 Q. Did she go back to her maiden 8 name? 9 A. No. 10 Q. So it's still Rhonda Grooms? 11 A. Uh-huh. 12 Q. Did it affect your personal life 13 in any other way? 14 A. Not really. 15 Q. And you've also asked for 16 humiliation, damages in relation to 17 humiliation. Tell me about humiliation. How 18 have you experienced humiliation? 19 A. Pretty much the same as the 20 others. And being made fun of. 21 Q. And you're talking about when 22 people come to -- when you go to calls and 23 people are saying, are you going to do us 24 like Aframan, you're a thief and stuff like 25 that?</p>	<p>29</p> <p>1 derogatory names as an officer? 2 A. Yeah. 3 Q. Can you give me an example of 4 some of those names? 5 A. Stupid, bitch. 6 Q. Unflattering things like that? 7 A. Correct. 8 Q. Do you recall how many people 9 took place in the search of the residence on 10 August 21st, 2022? 11 A. I can't recall. 12 Q. Was there more than six? 13 A. I would say yes. 14 Q. Is there anybody who took place 15 in that who is not a party to this lawsuit? 16 A. I can't recall. 17 Q. This may sound stupid, but is 18 there a document that exists that, if we were 19 able to get a copy of it, that would help you 20 recall? 21 A. Probably so. 22 Q. And what document would that be? 23 A. It would be a CAD sheet. 24 Q. And that's kept by the dispatch? 25 A. Uh-huh.</p>

<p>30</p> <p>1 Q. So the CAD would tell us who all 2 was there? 3 A. Uh-huh. 4 Q. Do you know of any ongoing 5 investigations or anything that would keep 6 that CAD from being released? 7 A. No, I don't. 8 Q. So in your lawsuit are you 9 claiming damages only for yourself or for you 10 and your ex-wife? 11 A. Myself. 12 Q. And I take it I'm correct in 13 saying you're suing in your individual 14 capacity? 15 A. Correct. 16 Q. Sitting here today your 17 Complaint asks for damages in excess of 18 \$25,000 for humiliation. How do you arrive 19 at that number? 20 A. You would have to ask my 21 attorney. 22 Q. Okay. As you sit here today, do 23 you know a dollar figure put on your 24 reputation damages? 25 A. I can't answer that.</p>	<p>32</p> <p>1 Q. What kind of resolution would 2 you like to see for this case? 3 A. I can't really answer that. For 4 myself? 5 Q. Yes. 6 A. Or for everybody? 7 Q. No, just yourself. 8 A. I would like to see -- see it to 9 be solved. 10 Q. Pardon me? 11 A. To be solved. Settling fairly. 12 Q. So you would want to see the 13 lawsuit settled fairly? 14 A. Correct. And an apology. 15 Q. An apology. And when you say 16 settled fairly, what does that mean exactly? 17 A. Just -- that I can't answer. 18 Q. Well, fair is a relative term, 19 so I'm just asking in your mind what's fair? 20 A. Well, I guess I reckon settle 21 up. 22 Q. Okay. Prior to today, have you 23 reviewed any documents to prepare you for 24 your deposition? 25 A. No.</p>
<p>31</p> <p>1 Q. Can't or won't? 2 A. Won't. 3 Q. Okay. If I was to figure up 4 your reputational damages, how would I go 5 about doing that? 6 A. I have no clue. 7 Q. Okay. You've also claimed 8 damages and emotional distress in excess of 9 \$25,000, do you know how you arrived at that 10 number? 11 A. You have to ask my attorney. 12 Q. Okay. As you're sitting here 13 today do you have knowledge of a number and 14 how that number was obtained in relation to 15 emotional damages? 16 A. You'd have to ask my attorney 17 that, too. 18 Q. So in your personal knowledge 19 you don't know? 20 A. I don't know. 21 Q. In your Complaint you have asked 22 for damages in excess of \$25,000 in relation 23 to humiliation. Do you know how you came up 24 with that number? 25 A. I don't know.</p>	<p>33</p> <p>1 Q. Have you reviewed your body cam 2 since that incident? 3 A. No. 4 Q. Do you have a copy of your body 5 cam? 6 A. Do I have a copy? 7 Q. Uh-huh. 8 A. Just what's on the -- downloaded 9 to the computer. 10 Q. Whose computer? 11 A. The sheriff's office. 12 Q. Okay. Have you ever seen any 13 doctors in relation to emotional distress? 14 A. No. 15 Q. Counselors, therapists? 16 A. No. 17 Q. Who all do you expect to call as 18 a witness besides the other officers in this 19 the case at trial? 20 A. No one. 21 Q. Would that also include expert 22 witnesses? 23 A. Yes. 24 MR. OSBORNE: If I could have a 25 moment, please?</p>

<p>34</p> <p>1 (Off the record.)</p> <p>2 MR. OSBORNE: Shawn, I have no</p> <p>3 further questions for you at this time. I</p> <p>4 think your attorney is going to ask you to</p> <p>5 waive or read.</p> <p>6 MR. KLINGLER: I will, but I've</p> <p>7 got just a handful of questions for Shawn</p> <p>8 myself here.</p> <p>9 DIRECT EXAMINATION</p> <p>10 BY MR. KLINGLER:</p> <p>11 Q. So, Shawn, has this whole</p> <p>12 incident made it harder to do your job in any</p> <p>13 way?</p> <p>14 A. Somewhat, yeah.</p> <p>15 Q. If I understood you earlier</p> <p>16 you've been called a thief on different</p> <p>17 occasions?</p> <p>18 A. Yes.</p> <p>19 Q. Have you ever been called a</p> <p>20 racist as a result of this?</p> <p>21 A. A few times.</p> <p>22 Q. Are you a thief?</p> <p>23 A. No, I'm not.</p> <p>24 Q. Are you a racist?</p> <p>25 A. No, I'm not.</p>	<p>36</p> <p>1 questions.</p> <p>2 MR. KLINGLER: Read and sign.</p> <p>3</p> <p>4 SHAWN GROOMS</p> <p>5</p> <p>6</p> <p>7</p> <p>8 ***</p> <p>9 (DEPOSITION CONCLUDED AT 12:21 P.M.)</p> <p>10 ***</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>35</p> <p>1 Q. Do you think some of the fallout</p> <p>2 from all of this had anything to do with your</p> <p>3 divorce?</p> <p>4 A. I think maybe a little bit of</p> <p>5 it.</p> <p>6 MR. KLINGLER: Okay. That's all</p> <p>7 I've got. Thank you.</p> <p>8 MS. MCELROY: I have no</p> <p>9 questions.</p> <p>10 MR. OSBORNE: I have one</p> <p>11 follow-up question.</p> <p>12 RECROSS-EXAMINATION</p> <p>13 BY MR. OSBORNE:</p> <p>14 Q. You said this might have</p> <p>15 something to do with your divorce. Would the</p> <p>16 correct person to ask about that be your</p> <p>17 ex-wife?</p> <p>18 A. You could try asking her. She's</p> <p>19 not very happy right now so --</p> <p>20 Q. Why is she not very happy?</p> <p>21 A. Because it didn't all go her</p> <p>22 way.</p> <p>23 Q. You mean in the divorce?</p> <p>24 A. Uh-huh.</p> <p>25 MR. OSBORNE: Okay. No further</p>	<p>37</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 STATE OF OHIO</p> <p>4 : SS</p> <p>5 COUNTY OF HAMILTON</p> <p>6</p> <p>7 I, Julie Patrick, the undersigned, a</p> <p>8 duly qualified notary public within and for</p> <p>9 the State of Ohio, do hereby certify that</p> <p>10 SHAWN GROOMS was by me first duly sworn to</p> <p>11 depose the truth and nothing but the truth;</p> <p>12 foregoing is the deposition given at said</p> <p>13 time and place by said witness; deposition</p> <p>14 was taken pursuant to stipulations</p> <p>15 hereinbefore set forth; deposition was taken</p> <p>16 by me in stenotype and transcribed by me by</p> <p>17 means of computer; that the transcribed</p> <p>18 deposition was made available to the witness</p> <p>19 for examination and signature and that</p> <p>20 signature may be affixed out of the presence</p> <p>21 of the Notary Public-Court Reporter. I am</p> <p>22 neither a relative of any of the parties or</p> <p>23 any of their counsel; I am not, nor is the</p> <p>24 court reporting firm with which I am</p> <p>25 affiliated, under a contract as defined in</p> <p>26 Civil Rule 28(D) and have no financial</p> <p>27 interest in the result of this action.</p> <p>28 IN WITNESS WHEREOF, I have hereunto set my</p> <p>29 hand and official seal of office at</p> <p>30 Cincinnati, Ohio this 22nd day of August,</p> <p>31 2025.</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> <p>76</p> <p>77</p> <p>78</p> <p>79</p> <p>80</p> <p>81</p> <p>82</p> <p>83</p> 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